

RECEIVED New Kensington-Arnold School District
Technology Department

JUN 19 2001

FCC MAIL ROOM

701 Stevenson Blvd.
New Kensington, PA 15068
<http://nkasd.wiu.k12.pa.us>

DOCKET FILE COPY ORIGINAL

Jim Jones, Technology Coordinator
jonesj@wiu.k12.pa.us

Phone 724-339-2747
FAX 724-337-8054

June 12, 2001

Federal Communications Commission
Office of the Secretary
445 12th St. SW
Room TW-A325
Washington, DC 20554

No. of Copies rec'd 0
List A B C D E

In the Matter Of: Request for Review by the New Kensington-Arnold School District of the Decision of the Universal Service Administrator on Appeal for Funding Year 2000-20001.

FCC Docket Nos. ~~96-45~~ and 97-21.

The district's first issue of concern is the late nature in which we were informed of our appeal denial from Schools and Libraries. The notification letter is dated April 11, 2001 but we did not receive the letter until June 12, 2001 - well past the 30 days allowed for an appeal to the FCC. The district never received the original letter in April and only after stating our concern about not hearing of a decision and consulting with our PA state E-Rate representative, Julie Tritt Schell who is a Director with the Office of Educational Technology in the Pennsylvania Department of Education, were we able find out that the original letter had been mailed (I suppose it is not the first time the U. S. Postal Service lost a letter). Julie requested that another letter be mailed to our district, which was done. We are requesting that the 30-day appeal process begin from June 12, 2001 and not April 11, 2001 due to the circumstances explained above. We are enclosing the envelope that the decision letter came in that shows the postmark date of June 7, 2001 to verify the dates outlined.

The decision the New Kensington-Arnold School District (Billed Entity Number 125191) is appealing is in reference to Form 471 Application Number 170199 for Funding Request Numbers 33605, 336551, 336630, and 336661. The appeal was denied by SLC because the services cited on the 470 were not posted for the required 28 days. We have enclosed a copy of the denial and highlighted the specific reasons cited (Attachment A).

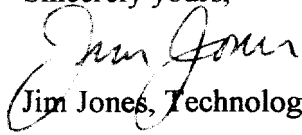
Our appeal of this adverse decision is based on the several factors:

- The five-year contract with Bell Atlantic (Verizon) is the same multi-year contract for Year 3 and Year 2 and covers the same services for both years. **This is not a new service.** (Copies of agreements enclosed)
- In Year 3 the **categories were switched** from Internet Access to Telecommunications but **not the services**. In Year 2 the 56K lines in question were used solely for Internet. The change was made due to the increased use of the 56K lines and we felt would be better in the Telecommunications category. (Attachment B)

- When the 470 cited in Year 3 did not contain a posting for Telecommunications it was because of the category switch not a service change.
- We attempted to use a different 470 number (542550000246701) in Year 3 but were advised by a PIA reviewer (correspondence enclosed) to supply the original 470 number (946820000192883) for the FRNs in question. 542550000246701 referenced the same multi-year services in Telecommunications in Year 3 and 946820000192883 referenced the identical original multi-year services as Internet Access in Year 2. (Attachment C)
- The original Funding Commitment Decision Letter of May 19, 2000 only denied funding because of a violation of the 28-day waiting period. The fact that the problems were being caused directly by a category switch and not a service switch never surfaced until recently and we were never given the opportunity when we received notice in the Funding Commitment Letter to change BACK to Internet Access from Telecommunications. It is our understanding that such a change would have been allowable at that time and would have resolved all the problems we now have.

The relief our district is seeking is for the FCC to understand that categories were changed in Year 3 and not services of our multi-year agreement with Bell-Atlantic as explained in detail above and that the decision of the SLC to deny funding be reversed.

Sincerely yours,



Jim Jones, Technology Coordinator, NKASD



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal of Funding Year 2000-2001

April 11, 2001

JUN 19 2001

Mr Jim Jones
New Kensington-Arnold School District
Technology Department
Valley High School
703 Stevenson Blvd.
New Kensington, PA 15068

FCC MAIL ROOM

Re: Billed Entity Number: 125191
471 Application Number: 170199
Funding Request Number(s): 336505, 336551, 336630, 336661, 474285
Your Correspondence Dated: May 23, 2000 and May 30, 2000

After thorough review and investigation of all relevant facts, the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company ("USAC") has made its decision in regard to your appeal of SLD's Year Three Funding Commitment Decision for the Application Number indicated above. This letter explains the basis of SLD's decision. The date of this letter begins the 30-day time period for appealing this decision to the Federal Communications Commission ("FCC"). If your letter of appeal included more than one Application Number, please note that for each application for which an appeal is submitted, a separate letter is sent.

Funding Request Number: 336505, 336551, 336630, 336661

Decision on Appeal: **Denied in Full**

Explanation:

- Your appeal letter indicates that these services were posted to your Year 2 470 (946820000192883) and these are part of a five year contract with Bell Atlantic of PA. The award dates are 12/20/98 for FRN 336505 and 11/03/98 for the remaining FRN's.
- The 470 that you cited on appeal does not contain a posting for telecommunications services. Program rules require that requests for services be posted for 28 days before selecting a vendor and entering into a contract. As these services were not posted for bidding on the 470 you cited, SLD denies this appeal.
- FCC rules require that except under limited circumstances, all Forms 470 received be posted on the website for 28 days, and that applicants carefully consider all bids received before selecting a vendor, entering into an agreement or signing a contract, and signing and submitting a Form 471. See 47 C.F.R. §§ 54.504; 54.511(a), (c). These competitive bidding requirements help ensure that applicants receive the lowest

Funding Request Number: 0000212129 Funding Status: Funded
SPIN: 143001398 Service Provider Name: Bell Atlantic - Pennsylvania, Inc.
Provider Contract Number:
Services Ordered: Internet Access
Earliest Possible Effective Date of Discount: 07/01/1999
Contract Expiration Date: N/A
Pre-discount Cost: \$4,920.00
Discount Percentage Approved by the SLD: 73%
Funding Commitment Decision: \$3,591.60 - 471 approved as submitted

T-1
Valley HS.

Funding Request Number: 0000212137 Funding Status: Funded
SPIN: 143001398 Service Provider Name: Bell Atlantic - Pennsylvania, Inc.
Provider Contract Number:
Services Ordered: Internet Access
Earliest Possible Effective Date of Discount: 07/01/1999
Contract Expiration Date: N/A
Pre-discount Cost: \$4,920.00
Discount Percentage Approved by the SLD: 73%
Funding Commitment Decision: \$3,591.60 - 471 approved as submitted

T-1
Valley MS

Funding Request Number: 0000212139 Funding Status: Funded
SPIN: 143001398 Service Provider Name: Bell Atlantic - Pennsylvania, Inc.
Provider Contract Number:
Services Ordered: Internet Access
Earliest Possible Effective Date of Discount: 07/01/1999
Contract Expiration Date: N/A
Pre-discount Cost: \$4,920.00
Discount Percentage Approved by the SLD: 73%
Funding Commitment Decision: \$3,591.60 - 471 approved as submitted

T-1
HD BERKEY

Funding Request Number: 0000212142 Funding Status: Funded
SPIN: 143001398 Service Provider Name: Bell Atlantic - Pennsylvania, Inc.
Provider Contract Number:
Services Ordered: Internet Access
Earliest Possible Effective Date of Discount: 07/01/1999
Contract Expiration Date: N/A
Pre-discount Cost: \$1,812.00
Discount Percentage Approved by the SLD: 73%
Funding Commitment Decision: \$1,322.76 - 471 approved as submitted

56 K
FE. Crawford
Elem. School

Funding Request Number: 0000212144 Funding Status: Funded
SPIN: 143001398 Service Provider Name: Bell Atlantic - Pennsylvania, Inc.
Provider Contract Number:
Services Ordered: Internet Access
Earliest Possible Effective Date of Discount: 07/01/1999
Contract Expiration Date: N/A
Pre-discount Cost: \$1,812.00
Discount Percentage Approved by the SLD: 73%
Funding Commitment Decision: \$1,322.76 - 471 approved as submitted

56 K
Martin School

Attached B

year 2 FCR - All FUNDED
1999-2000

Filed as Internet Access rather than
Telecommunications Service in yr. 2

IN. YEAR 3 Filed as Telecom. Service

yellow highlighted Funded year 2
But Not funded YEAR 3

Funding Request Number: 0000212146 Funding Status: Funded
SPIN: 143001398 Service Provider Name: Bell Atlantic - Pennsylvania, Inc.
Provider Contract Number:
Services Ordered: Internet Access
Earliest Possible Effective Date of Discount: 07/01/1999
Contract Expiration Date: N/A
Pre-discount Cost: \$1,812.00
Discount Percentage Approved by the SLD: 73%
Funding Commitment Decision: \$1,322.76 - 471 approved as submitted

56 K

Greenwald Elem
School

Funding Request Number: 0000277882 Funding Status: Funded
SPIN: 143001398 Service Provider Name: Bell Atlantic - Pennsylvania, Inc.
Provider Contract Number:
Services Ordered: Internet Access
Earliest Possible Effective Date of Discount: 07/01/1999
Contract Expiration Date: N/A
Pre-discount Cost: \$1,812.00
Discount Percentage Approved by the SLD: 73%
Funding Commitment Decision: \$1,322.76 - 471 approved as submitted

56 K

Edgewood Elem
School

Filed as Internet Access in Year 2
Since these are the lines that provide
Internet Access to the Buildings.

In Year 3 filed under Telecom. Serv.

ENCLOSURE B

Year 2 FCR
1999-2000

ALL FUNDED

ORIGINAL 470 NUMBER FOR SERVICES -
946820000192883

Telecommunications

ENCLOSURE

B

FUNDING COMMITMENT REPORT

Form 471 Application Number: 170199

Funding Request Number: 336355 Funding Status: Funded
 SPIN: 143001398 Service Provider Name: Bell Atlantic - Pennsylvania, Inc.
 Contract Number: na
 Services Ordered: Telecommunications Services
 Earliest Possible Effective Date of Discount: 07/01/2000
 Contract Expiration Date: 05/30/2003
 Site Identifier: 42 16740 06184
 Billing Account Number: 724-335-2511
 Pre-Discount Amount: \$4,920.00
 Discount Percentage Approved by the SLD: 80%
 Funding Commitment Decision: \$3,936.00 - 471 approved as submitted
 Funding Commitment Decision Explanation: c

YMS

Funding Request Number: 336505 Funding Status: ~~Not Funded~~ See Attachment K and
 SPIN: 143001398 Service Provider Name: Bell Atlantic - Pennsylvania, Inc. Enclosure C
 Contract Number: na
 Services Ordered: Telecommunications Services
 Earliest Possible Effective Date of Discount: 07/01/2000
 Contract Expiration Date: 12/20/2003
 Site Identifier: 42 16740 05167
 Billing Account Number: 724-335-8221
 Pre-Discount Amount: \$4,920.00
 Discount Percentage Approved by the SLD: N/A
 Funding Commitment Decision: \$0.00 - 28 Day Waiting Period Violated
 Funding Commitment Decision Explanation: The Form 471 application was signed and/or submitted prior to the expiration of the 28-day waiting period from the day of the posting of the Form 470 to the SLD Web Site.

HD BERKEY

Funded Last year
 contract attached
 for 5 years - start date 12-20-98

Funding Request Number: 336551 Funding Status: ~~Not Funded~~ Attachment - O
 SPIN: 143001398 Service Provider Name: Bell Atlantic - Pennsylvania, Inc.
 Contract Number: na
 Services Ordered: Telecommunications Services
 Earliest Possible Effective Date of Discount: 07/01/2000
 Contract Expiration Date: 06/30/2005
 Site Identifier: 42 16740 04463
 Billing Account Number: 724-335-4401
 Pre-Discount Amount: \$5,920.00
 Discount Percentage Approved by the SLD: N/A
 Funding Commitment Decision: \$0.00 - 28 Day Waiting Period Violated
 Funding Commitment Decision Explanation: The Form 471 application was signed and/or submitted prior to the expiration of the 28-day waiting period from the day of the posting of the Form 470 to the SLD Web Site.

Contract start date: 11-3-98
 Ft Crawford - funded in prior year - 5 yr contract attached

Funding Request Number: 336578 Funding Status: Funded
 SPIN: 143001398 Service Provider Name: Bell Atlantic - Pennsylvania, Inc.
 Contract Number: NA
 Services Ordered: Telecommunications Services
 Earliest Possible Effective Date of Discount: 07/01/2000
 Contract Expiration Date: 06/30/2005
 Site Identifier: 42 16740 04466
 Billing Account Number: 724-337-4536
 Pre-Discount Amount: \$1,812.00
 Discount Percentage Approved by the SLD: 80%
 Funding Commitment Decision: \$1,449.60 - 471 approved as submitted
 Funding Commitment Decision Explanation: c

Martin Funded and was Contracted at the same time as those schools not funded

Telecommunications

Year 3 FCR

Buildings not funded in RED and were funded last year All under Same Contract as in previous years

ORIGINAL 470 NUMBER ON WHICH These are BASED

946820000192883

Supplied/given in year 2

ENCLOSURE

B

FUNDING COMMITMENT REPORT

Form 471 Application Number: 170199

Funding Request Number: 336630 Funding Status: Not Funded Attachment - 0
 SPIN: 143001398 Service Provider Name: Bell Atlantic - Pennsylvania, Inc.
 Contract Number: NA
 Services Ordered: Telecommunications Services
 Earliest Possible Effective Date of Discount: 07/01/2000
 Contract Expiration Date: 06/30/2005
 Site Identifier: 42 16740 04462
 Billing Account Number: 724-335-4401
 Pre-Discount Amount: \$1,812.00
 Discount Percentage Approved by the SLD: N/A
 Funding Commitment Decision: \$0.00 - 28 Day Waiting Period Violated
 Funding Commitment Decision Explanation: The Form 471 application was signed and/or submitted prior to the expiration of the 28-day waiting period from the day of the posting of the Form 470 to the SLD Web Site.

Greenwald -
Funder Year 2
Contract attached
Start 11-3-98

Funding Request Number: 336661 Funding Status: Not Funded Attachment - 0
 SPIN: 143001398 Service Provider Name: Bell Atlantic - Pennsylvania, Inc.
 Contract Number: NA
 Services Ordered: Telecommunications Services
 Earliest Possible Effective Date of Discount: 07/01/2000
 Contract Expiration Date: 06/30/2005
 Site Identifier: 42 16740 04461
 Billing Account Number: 724-335-4401
 Pre-Discount Amount: \$1,812.00
 Discount Percentage Approved by the SLD: N/A
 Funding Commitment Decision: \$0.00 - 28 Day Waiting Period Violated
 Funding Commitment Decision Explanation: The Form 471 application was signed and/or submitted prior to the expiration of the 28-day waiting period from the day of the posting of the Form 470 to the SLD Web Site.

Edgewood -
Funder Year 2 -
Contract attached
Start date 11-3-98

Funding Request Number: 336772 Funding Status: Not Funded
 SPIN: 143005883 Service Provider Name: Netcom Technologies, Inc.
 Contract Number: NA
 Services Ordered: Internal Connections
 Earliest Possible Effective Date of Discount: 07/01/2000
 Contract Expiration Date: 06/30/2001
 Site Identifier: 42 16740 04469
 Billing Account Number: na
 Pre-Discount Amount: \$25,930.40
 Discount Percentage Approved by the SLD: N/A
 Funding Commitment Decision: \$0.00 - Srvc/Disct will NOT be funded
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal Connections less than 81 % discount to be funded. Please see
 WWW.SL.UNIVERSALSERVICE.ORG for further details.

Funding Request Number: 336808 Funding Status: Not Funded
 SPIN: 143004841 Service Provider Name: Questeq
 Contract Number: NA
 Services Ordered: Internal Connections
 Earliest Possible Effective Date of Discount: 07/01/2000
 Contract Expiration Date: 06/30/2001
 Billing Account Number: NA
 Pre-Discount Amount: \$111,300.00
 Discount Percentage Approved by the SLD: N/A
 Funding Commitment Decision: \$0.00 - Srvc/Disct will not be funded
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal Connections less than 81% discount to be funded. Please see
 WWW.SL.UNIVERSALSERVICE.ORG What's New Area for further details.

year 3 FCR

ORIGINAL 470 Number for Services -
 946820000192883

James Jones

From: Pina Portanova <pportan@neca.org>
 To: <jonessr@wiu.k12.pa.us>
 Sent: Tuesday, April 25, 2000 9:21 AM
 Subject: E-Rate Application

Dear Mr. Jones

I am in the process of reviewing your 471 application #170199, form identifier: NKASD, and I need some additional information. In particular I need the originating 470 # for which services were posted for these particular FRN's (funding request numbers): 335912, 336355, 336505, 336551, 336630, 33661.

I did find a previous year 470 for which these services were posted, I just need you to verify it is correct. 470 #762600000004214. Please verify and respond within 7 days so that I can continue my review of the application. You can either respond by e-mail or fax.

If you have any questions please call me at 973-428-7342. Thank you in advance for your cooperation.

Pina Portanova
 PIA Reviewer
 Schools and Libraries Division
 Phone: 973-428-7342
 FAX: 973-884-8023

you

1.888 203 8100

336578 Martin yr 2

FR 470#

FRN	ORIGINATION DATE	SERVICE	470 #
335912	1998-1999 YR 1	T-1 Frans Relay Valley HS	7626000 0000 4214
336355	98-99	T-1 Frans VMS	7626000 0000 4214
336505	99-00 YR 2	T-1 Frans Relay HD Busby	946 820000 192 883
336551	99-00	56 K to T-1 upgrade FT.	946 820000 192 883
336630	99-00	56 K Harris	946 820000 192 883
33661		Edgum	

New Kensington-Arnold School District Technology Department Valley High School

703 Stevenson Blvd.
New Kensington PA 15068
<http://nkasd.wiu.k12.pa.us>

Mr. Jim Jones, Coordinator
jonesr@wiu.k12.pa.us

Phone 724-339-2747
FAX 724-337-8054

April 26, 2000

To: Pina Portanova, PIA Reviewer

RE: 471 Application #170199

The following is a listing of the information you requested from me on April 25, 2000. I have added FRN # 336578 that was not originally requested but since that service is the same as the others you are researching I included it as well.

FRN Number	Origination Date	Service	Original 470 Number
335912	98-99 - year 1	T-1 frame relay Valley HS	762600000004214
336355	98-99 - year 1	T-1 frame relay Valley MS	762600000004214
336505	99-00 - year 2	T-1 frame relay H.D Berkey	946820000192883
336551	99-00 - year 2	56 K frame relay Ft. Crawf. School	946820000192883
336578	99-00 - year 2	56 K frame relay Martin School	946820000192883
336630	99-00 - year 2	56 K frame relay Greenwald School	946820000192883
336661	99-00 - year 2	56 K frame relay Edgewood School	946820000192883

Jim Jones
New Kensington-Arnold SD



USAC
UNIVERSAL SERVICE
ADMINISTRATIVE CO.
Schools and Libraries
Division

Box 125 - Correspondence Unit
100 South Jefferson Road
Whippany, NJ 07981

Attachment C

NEW KENSINGTON-ARNOLD DISTRICT
Mr. Jim Jones
701 STEVENSON BLVD
NEW KENSINGTON, PA 15068-5372

|||||

Important Notice
about your Form 470 Application
Entity Number: 125191

DATE: 11/22/1999

We are pleased to inform you that the Schools and Libraries Division/USAC (SLD) has received your properly completed FCC Form 470, Description of Services Requested. This letter provides important information about the processing of your Form 470 application. Please read this letter carefully and retain it for your records and future reference.

SLD has assigned the following Form 470 Application Number (470AN) to your FCC Form 470: 542550000246701. Please record this number in a safe place. The 470AN is used to track your Form 470, and it must be provided in Block 5, Item 12 of each FCC Form 471, Services Ordered and Certification Form, which cites this Form 470. Any Form 471 applicant who relies on this Form 470 must know this 470AN. Such applicants must be listed on this Form 470 in Block 4, Item 17, or be included through selection of the "Statewide" designation of Item 16b of Block 4. You may wish to share the 470AN from this Form 470 with those schools and/or libraries featured in Block 4, to assist them in their preparation of Form 471 applications.

The next step in the application process is the completion of a FCC Form 471, Services Ordered and Certification Form. FCC rules require that requests for new services be posted on the SLD Web Site for a period of 28 days before you enter into and sign any contracts with service providers, and before you identify your providers of tariff or month-to-month services on your Form 471. In addition, if you are a first-time filer of the Form 470 seeking discounts for services under a multi-year contract signed on or before 7/10/1997, the SLD requires that you wait 28 days before filing Form 471.

Your Form 470 was posted by the SLD on 10/29/1999. Accordingly, a contract or contracts may be signed for requested services on or after 11/26/1999. This is your "Allowable Contract Date". The SLD will be prepared on that date to receive your Form(s) 471. A properly completed Form 471, with a signed Form 471 certification, must be received by the SLD no later than 01/08/2000 in order to be included in the initial Form 471 filing window. If your allowable contract date is after the window closes, your Form 471 will not be considered together with those received within the window.

A properly completed certification for your Form 470 has been received and entered.

It is important to remember that not all requested services may necessarily be approved for discounts. Your Form 471 is subject to review by the SLD for a determination of funding eligibility before funds are committed. (This review will consider all program rules including eligibility of discount recipients and the eligibility of services for which discounts are requested.) In addition, availability of funds will be a factor in funding decisions. Therefore, you should consider the possibility of a denial of funding or a level of funding below your request, and include appropriate contingencies in contracts for any or all of the requested services.

If you have any questions, please call the SLD Client Service Bureau at 888-203-8100.

• 470 POSTED on 10-29-99
• 471 Submitted on 1-13-2000
FAR Exceeds 28 Days

FRNs
Filed under
Telecommunications
PREVIOUSLY CONTRACTED
SERVICES HAVE
A Different 470 #
AS indicated on Attachment
ENCLOSED

1/13

attachment

**BELL ATLANTIC AUTHORIZED DISTRIBUTOR
SALES LETTER OF INTENT**

COMPANY NAME: NEW KENSINGTON-ARNOLD SCHOOL DISTRICT

BILLING TELEPHONE NUMBER: (724) 335-8221

APPLICATION FOR SERVICE

IN ACCORDANCE WITH THE FCC TARIFF OF THE BELL ATLANTIC
TELEPHONE COMPANIES ON FILE WITH THE FEDERAL COMMUNICATIONS
COMMISSION, THIS APPLICATION IS SUBMITTED FOR:

TYPE OF SERVICE: T1 FRAME RELAY

COMMITMENT TERM: 5 YEAR

INSTALLATION: _____ MONTHLY: \$ 408.00

THE APPLICANT UNDERSTANDS THAT THE APPLICABLE PROVISIONS IN
THE BELL ATLANTIC TELEPHONE COMPANIES TARIFFS BECOME THE
CONTRACT BETWEEN THE APPLICANT AND THE BELL ATLANTIC
TELEPHONE COMPANIES.

COMPANY NAME: NEW KENSINGTON-ARNOLD SCHOOL DISTRICT

TITLE: Superintendent of New Kensington-Arnold School District

DATE:

AUTHORIZED DIST: BELL ATLANTIC TELEPHONE COMPANIES

SIGNED:

Start Date: 12-20-98
HD Berkey
Upgrade to
T-1

BELL ATLANTIC AUTHORIZED DISTRIBUTOR SALES LETTER OF INTENT

COMPANY NAME: NEW KENSINGTON-ARNOLD SCHOOL DISTRICT

BILLING TELEPHONE NUMBER: 724-335-4401

APPLICATION FOR SERVICE

IN ACCORDANCE WITH THE FCC TARIFF OF THE BELL ATLANTIC
TELEPHONE COMPANIES ON FILE WITH THE FEDERAL COMMUNICATIONS
COMMISSION, THIS APPLICATION IS SUBMITTED FOR:

TYPE OF SERVICE: 4-56K FRAME RELAYS

COMMITMENT TERM: 5 YEAR

INSTALLATION: \$ 0 - no fee - waived MONTHLY: \$155 for each 56K, plus PVC

THE APPLICANT UNDERSTANDS THAT THE APPLICABLE PROVISIONS IN THE BELL
ATLANTIC TELEPHONE COMPANIES TARIFFS BECOME THE CONTRACT BETWEEN THE
APPLICANT AND THE BELL ATLANTIC TELEPHONE COMPANIES.

COMPANY NAME: NEW KENSINGTON-ARNOLD SCHOOL DISTRICT

TITLE: Superintendent of New Kensington-Arnold School District

DATE:

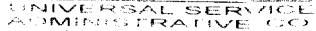
AUTHORIZED DIST: BELL ATLANTIC TELEPHONE COMPANIES

SIGNED:

Start Date:

11-3-98

[Handwritten Signature]



Whippary, NJ 07981

1:506A+8357 11111111111111111111111111111111